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Attorneys for Defendant: MUHAMMAD MUDASSAR ANWAR
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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
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10 AMAZON.COM, INC et al,
11 Plaintiff,

12 vs.

13 MUHAMMAD MUDASSAR
ANWAR, an individual, TECH DRIVE
14 PVT, LLC, a New York Limited
Liability Company, et al.

15 Defendants.
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Case No.: 3:23-cv-05580-TLT-RI

**MUHAMMAD MUDASSAR
ANWAR DECLARATION IN
SUPPORT OF MOTION TO
SETASIDE DEFAULT AND
DISMISS CASE FOR LACK OF
PERSONAL JURISDICTION**

Hearing

Date: February 25th, 2025

Time: 2:00 p.m.

Place: 450 Golden Gate Avenue,
Courtroom #9 (19th Floor) San
Francisco, CA 94102.

[Filed concurrently with notice of
motion, proposed order and
memorandum of points and authorities]

23 **MUHAMMAD MUDASSAR ANWAR DECLARATION IN SUPPORT OF**
24 **MOTION TO SETASIDE DEFAULT AND DISMISS CASE FOR LACK OF**
25 **PERSONAL JURISDICTION**
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2 1. I, MUHAMMAD MUDASSAR ANWAR, hereby declare as follows:

3 I am the defendant named in this action. I make this declaration based on personal
4 knowledge of the information contained in this declaration and, if called upon to
5 do so, could competently testify to the information set forth in this declaration.
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7 2. I live in Scarsdale, New York and have for all times relevant to this
8 complaint, for the last 7 years.
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10 3. I am the owner of Tech Drive PVT, also named as a Defendant in this case.

11 The company is located in New York at all relevant times, but is now closed.
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13 4. I deny the allegations made in the complaint.

14 5. I have never had any offices in California.

15 6. I do not do any business targeted to California.

16 7. I did not register the domain name they are accusing me of.
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18 8. I do not own any real estate or other property in California.

19 9. I have never had any employees, or agents in California.

20 10. I have never had any businesses running in California.
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22 11. I never created a website and never inserted a California address as Plaintiff
23 claims.

24 12. I had no reason to believe I could be sued in California, and it would cause
25 me great financial hardship to be forced to litigate this case in California.
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1 I declare under penalty of perjury under the Laws of the United States of
2 America that the foregoing is true and accurate.

3 DATED this 20th day of December 2024 and executed at New York (state)
4 in Scarsdale (city).

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7 DECLARANT MUHAMMAD MUDASSAR ANWAR
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